

**AFFIDAVIT OF BRYCE FERRARA IN SUPPORT OF
AN APPLICATION FOR A COMPLAINT**

I, Bryce Ferrara, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since 2019. I am assigned to the FBI Boston Division's Violent Crimes Task Force ("VCTF"), which comprises law enforcement officers from the FBI, Massachusetts State Police ("MSP"), and other local police departments. As a member of the VCTF, I am responsible for investigating kidnappings, murders, robberies, extortion, and other violent crimes. My investigations have included the use of surveillance techniques and the execution of arrest warrants and search and seizure warrants, including those involving data from telephone and other electronic service providers.

PURPOSE OF AFFIDAVIT

2. I am aware that Title 18, United States Code, Section 1951(a) makes it a crime to obstruct, delay, or affect commerce by forcefully taking or obtaining property by way of physical violence and Title 18, United States Code, Section 922(g)(1) makes it a crime for any person who has been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year to possess a firearm.

3. Having said so, I make this affidavit in support of an application for a complaint charging FERNANDO BOST ("BOST"), date of birth xx-xx-1991, with two counts of affecting commerce by robbery, in violation of 18 United States Code, Section 1951(a) and one count of felon in possession of a firearm, in violation of 18 United States Code, Section 922(g)(1).

4. The statements in this affidavit are based in part on information provided by other

law enforcement officers, statements of witnesses, information gleaned from third parties, and on other aspects of my investigation of this matter. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the complaint.

PROBABLE CAUSE

RJ Store Robbery (Dorchester) – March 29, 2023

5. Based on a review of surveillance and police reports, on March 29, 2023, at approximately 11:05 P.M., a male entered the RJ Smoke and Convenience Store located at 844 Blue Hill Avenue in Dorchester, Massachusetts, and approached the victim cashier and brandished a black colored handgun. The male walked behind the counter while assuming a crouching position and aimed the handgun directly at the victim cashier. While at gunpoint, the male issued commands to the victim cashier. The victim cashier took a kneeling position behind the cash register. The victim cashier opened the cash register and raised his hands up. The male took cash out of the tray in the register while forcing the victim cashier to kneel with his face towards the floor and his hands on the ground. The male took approximately \$700 to \$800 in U.S. cash. The male fled the store onto Blue Hill Avenue towards Vesta Road.

6. Initial reports of the robber provided to the officers described the robber as a black male, five feet six inches, medium build, thirty-five to forty years of age, wearing a black jacket, black pants, and a black mask. Boston Police Department (BPD) Detectives spoke with the victim cashier on scene who clarified the robber was “tall”, approximately five feet eight inches to six feet in height.

7. After reviewing camera footage, BPD Officers observed the robber to have been wearing a black mask, black hooded sweatshirt, blue nitrile gloves, black sweatpants with the word “Ice Cream” written down the left leg in white lettering and black sneakers. Below are images from the surveillance:



8. Since December 2022, VCTF has been working with BPD to identify subject(s) conducting convenience store robberies in the Greater Boston area. VCTF learned of the RJ Store robbery via a Boston Regional Intelligence Center (BRIC) Identification Wanted Flyer for the RJ Store robbery disseminated on March 29, 2023. After learning of the robbery, VTCTF coordinated with BPD to further the investigation.

9. Subsequent to the robbery in Dorchester, Massachusetts on March 29, 2023, members of BPD and VCTF conducted a video canvass in the vicinity of 844 Blue Hill Avenue. The canvass included retrieving video from commercial, city, and private cameras for review.

10. Investigators reviewed video footage and identified a vehicle of interest which

appeared to be a maroon-colored sport utility vehicle (SUV) with a different colored rear bumper and silver roof racks. Based on the video footage, the bumper appeared to be either grey or tan in color. At the time of reviewing the initial footage, investigators were unable to determine if the bumper was an aftermarket addition.

11. The vehicle of interest was observed on multiple city cameras driving in the vicinity of 844 Blue Hill Avenue prior to the robbery and was observed leaving the vicinity of 844 Blue Hill Avenue after the robbery. Video footage captures the vehicle within approximately 0.01 miles driving past RJ Store at approximately 10:50 P.M. and ultimately parking within 0.1 miles of RJ Store at approximately 11:00 P.M. Video footage also captures the vehicle at approximately 11:09 P.M. within 0.2 miles of the store leaving the vicinity of the robbery.

12. Investigators also observed an individual who matches the description of the robber from RJ Store exit from the vicinity of the vehicle of interest and walk on Calder Street towards Blue Hill Avenue prior to the robbery. After the robbery, the individual appears to approach the vehicle of interest at approximately 11:08 P.M. Investigators were unable to determine if the subject got into the car because of the angle of the camera, however they were able to see the vehicle's break lights turning on within several seconds of the individual approaching it.

13. Investigators consulted with Mark Huard, a Special Agent with the National Insurance Crime Bureau, who has experience identifying vehicle makes and models. That individual advised the vehicle depicted in the surveillance appeared to be a Kia Sorento, model years 2009-2014 based on the curved back, rear lower bumper of the vehicle, and roof racks.

14. On March 30, 2023, the BRIC disseminated a BOLO/ID Wanted flyer for the vehicle of interest. The flyer included photographs of the vehicle of interest and described the vehicle as a maroon SUV with a tan rear bumper, possibly a Kia Sorento.

15. On March 31, 2023, at approximately 1:15 P.M., BPD Officers on patrol in the area of Codman Square in Dorchester, Massachusetts observed a vehicle matching the description of the vehicle of interest. The officers were aware of the vehicle of interest based on the BRIC Flyer.

16. As the police cruiser passed the vehicle of interest, the BPD officer observed the vehicle was occupied by a black female driver and a black male in the front passenger seat. The BPD officer observed the male passenger turn his head and body around to continue to watch the location of the cruiser as the cruiser drove away in the opposite direction. After passing the vehicle of interest, the BPD officer was able to observe the rear bumper of the vehicle of interest and saw it had a distinctive faded/weather black/gray colored rear bumper consistent with the photographs of the vehicle of interest¹. BPD officers attempted to turn their cruiser around and catch up with the vehicle of interest but lost sight of it due to traffic constraints.

17. BPD officers noted a Massachusetts registration and license plate number 2LER88. The records maintained by the RMV confirmed the vehicle was a 2012 Kia Sorento (SORENTO), color red. Investigators involved in the RJ Store investigation were notified of the observations by the BPD officers on March 31, 2023.

7-Eleven Robbery (Brockton), March 29, 2023

18. While investigating the robbery of RJ Store, investigators also learned the 7-Eleven located at 411 Pleasant Street in Brockton, Massachusetts was robbed on March 29, 2023, at approximately 10:20 P.M.

19. Brockton Police detectives conducted an interview with the victim cashier who

¹ Initial descriptions of vehicle of interest's bumper were either grey or tan. The vehicle was originally only observed through video footage which, depending on the amount of light or light source where the video recording is occurring, could impact the viewer's perception of the actual color. BPD officers were the first individuals to see the color of the bumper in person.

advised that an unknown male walked into the store, brandished a black colored handgun, and demanded money from the victim. The victim described the unknown male as a skinny black male, wearing all black, blue surgical gloves, and a black facemask. The male took approximately \$160.

20. Brockton Police detectives were able to review surveillance footage from the store and observed the robber was wearing a dark colored hoodie and black pants with the word “Ice Cream” written in white lettering on the left leg. Still images from that surveillance footage are included below:



IDENTIFICATION OF LIKELY SUSPECT

21. After reviewing surveillance footage from 7-Eleven and RJ Store, investigators determined the robber was likely the same individual based on the unique clothing worn by the robber to include the dark colored sweatshirt, blue gloves, and dark colored sweatpants with the word “Ice Cream” written in white lettering on the left leg along with the proximity in time during which the robberies occurred.

22. Investigators have reviewed information from Massachusetts State Police License Plate Readers (LPRs) located between Brockton and Boston on March 29, 2023. The SORENTO was observed by an LPR located on Pleasant Street in Brockton three times prior to the 7-Eleven

robbery (which occurred at 10:20 P.M.): at approximately 9:30 P.M.; 9:37 P.M.; and 9:54 P.M. The LPR located on Pleasant Street is approximately 440 feet from the 7-Eleven that was robbed. At approximately 10:32 P.M., the SORENTO was captured by an LPR on Route 24 Northbound, in Randolph, Massachusetts after the 7-Eleven robbery. The data from the LPR hit indicates the SORENTO was traveling towards Boston, Massachusetts.

23. The registered owner of the SORENTO is Margarita Castillo-Parra (CASTILLO-PARRA). CASTILLO-PARRA's license summary indicates that she resides at 85 Business Street in Hyde Park, Massachusetts. Investigators spoke with CASTILLO-PARRA and learned that she used the application, Getaround², to rent her SORENTO to various customers of the platform. CASTILLO-PARRA provided investigators with information that from March 22, 2023, until April 2, 2023, only one customer, username "Taquasha W", was listed as renting the SORENTO.

24. Investigators subpoenaed Getaround, Inc. for records corresponding to username, "Taquasha W", and the SORENTO. Getaround, Inc. identified Taquasha Wiggins (WIGGINS), date of birth XX/XX/1995, and an address of 27 Bradeen Street, Apartment 1, in Roslindale, Massachusetts as the registered account holder for the username "Taquasha W."

25. As part of its user agreements and terms of service, Getaround, Inc. maintains location data for users of the application. The location of all Getaround cars is tracked by a Getaround Connect device installed in the vehicle, which has an AT&T data sim-card and communicates through the cellular data network.

26. Getaround, Inc. provided investigators with location data for the SORENTO from

² Getaround is an online marketplace that connects Hosts and Guests from their car sharing community. Individuals can share their own cars on the platform (Hosts) and Guests can use the mobile app or website to book a car and unlock it without the need to meet someone and hand off keys.

March 22, 2023, until April 2, 2023. The location data from Getaround, Inc. places the SORENTO on Calder Street in Dorchester, Massachusetts approximately 0.1 miles from the RJ Store located at 844 Blue Hill Avenue from approximately 10:58 P.M. to 11:07 P.M. on March 29, 2023. The location data is consistent with the areas where the SORENTO was observed in video footage.

27. Location data from Getaround, Inc, also places the SORENTO on Prospect Street in Brockton, Massachusetts, approximately 0.1 miles from the 7-Eleven at approximately 10:17 P.M. to 10:21 P.M. on March 29, 2023, which is the same timeframe during which that robbery occurred.

28. After identifying WIGGINS as the registered user of the SORENTO, investigators learned from BPD detectives familiar with this investigation that those detectives were also aware of WIGGINS from previous interactions, several of which were due to her association with an individual named Fernando Bost (BOST), date of birth XX/XX/1991.

29. A review of a BPD incident report from August 05, 2022, identified BOST as WIGGINS' boyfriend. In this regard, investigators learned that on August 15, 2022, BPD officers responded to a call involving WIGGINS and another female. WIGGINS allegedly assaulted the other female after WIGGINS attempted to retrieve BOST's cellphone from the second female. BOST ultimately filed a restraining order against WIGGINS in the Dorchester Division of the Boston Municipal Court.

30. Investigators believe it is fair to infer the robber is an associate of WIGGINS, such as a boyfriend. Investigators have been able to place the SORENTO, rented by WIGGINS, in the vicinity of the 7-Eleven and RJ Store during the time of the respective robberies, and, in each case the robber was described as a black male. Further, as previously noted, *supra* ¶16, when the SORENTO was observed by BPD officers on March 31, 2023, only days after the March 29, 2023,

robberies, a black male was observed in the front passenger seat.

31. Upon review of BOST's criminal record, investigators noted that it included several charges for armed and unarmed robbery along with three outstanding warrants issued out of three different courts (West Roxbury Division of the Boston Municipal Court, Framingham District Court, and Hampden Superior Court). The outstanding warrants include charges for armed robbery, assault with a dangerous weapon, breaking and entering daytime for felony, receiving stolen property, and shoplifting.

32. BOST was also sentenced in 2012 out of Hampden Superior Court for four and a half to five and a half years for armed robbery and again in 2017 out of Hampden Superior Court to six years to six years plus one day for armed robbery.

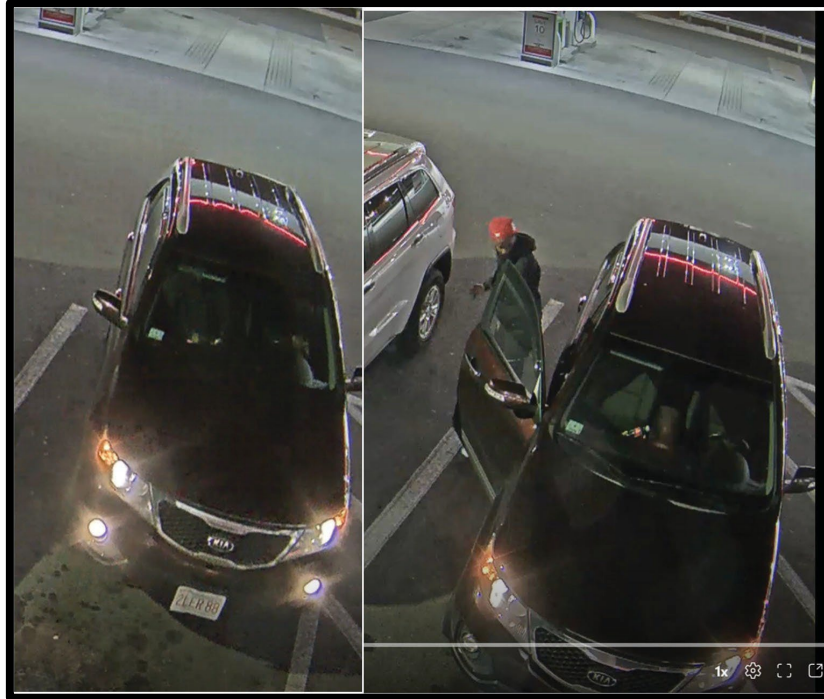
33. Investigators reviewing BOST's license photo, previous booking photos, and physical descriptors believe he matches the general description of the robber to include skin tone, height, and build provided by victim cashiers and the individual observed on surveillance footage.

34. After identifying BOST as a potential suspect, investigators sought records from Conduent Incorporated³ for any materials associated with accounts linked to BOST⁴. Conduent Incorporated records identified an account registered to BOST, date of birth xx/xx/1991, social security account number xxx-xx-1646 as having been used on March 27, 2023, at approximately 12:29 A.M. at the Brockton Irving Gas Station located at 683 Pleasant Street in Brockton, Massachusetts.

³ Conduent Incorporated is a business service provider for government programs such as the Electronic Payment Processing and Information Control (EPPIC™) which is an application used to streamline the business of administering Department of Transitional Assistance (DTA) program payments made to clients through an Electronic Benefit Transfer (EBT).

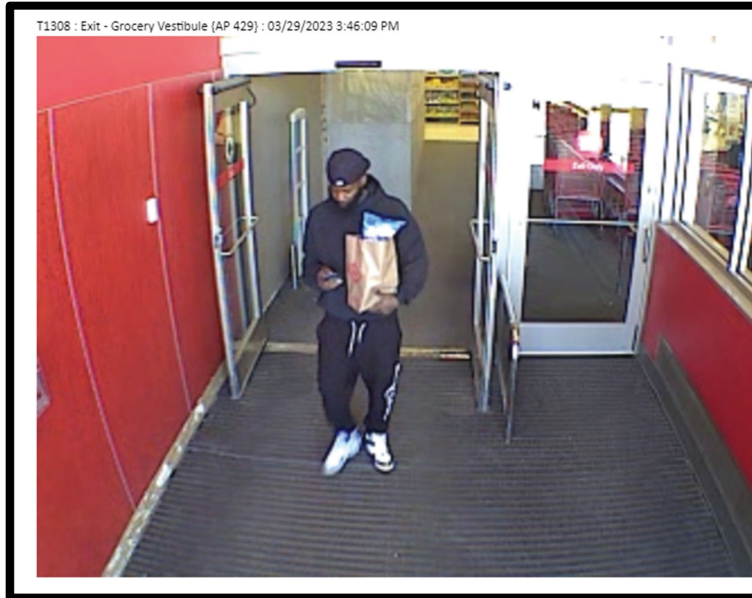
⁴ Based on my training and experience conducting investigations, financial records, which can include credit cards, bank accounts, and DTA programs can often assist investigators in developing intelligence and leads on potential suspects to further investigations.

35. Investigators retrieved surveillance footage from the gas station and identified an individual whose appearance is consistent with the description of BOST, who was observed exiting the SORENTO on March 27, 2023, at the Rusty Lantern Market at Irving Gas Station located at 683 Pleasant Street in Brockton, Massachusetts. Still images from surveillance are included below.



36. The Conduent Incorporated records further identified the account registered to BOST, as being used on March 29, 2023, at approximately 3:44 P.M. at the Target located at 400 Cochituate Road in Framingham, Massachusetts. That was the same day as the 7-Eleven robbery in Brockton and the RJ Store robbery in Dorchester, Massachusetts.

37. Investigators retrieved surveillance footage from Target. In that surveillance, an individual that appears to be BOST can be seen wearing dark colored sweatpants with white lettering on the left leg of the pants. Still images from surveillance are included below:



ARREST OF BOST

38. On April 5, 2023, Investigators contacted Springfield Police Department (SPD) regarding BOST's connections to the Springfield area. BOST's last known address was in Springfield, Massachusetts and BOST's Conduent Incorporated records list transactions in Springfield, Massachusetts on April 5, 2023. LPR readers also picked up the SORENTO on March 31, 2023, in Springfield, Massachusetts, furthering investigators' belief that BOST maintained ties to the Springfield area. Investigators also informed SPD, that BOST was possibly traveling in a green colored Infiniti (INFINITI) JX35, which is registered to WIGGINS⁵. SPD was further informed that BOST was wanted on three outstanding warrants and was a suspect in several armed robberies in the Greater Boston area.

39. On April 6, 2023, law enforcement officers located the INFINITI registered to

⁵ RMV records for WIGGINS revealed she was also the registered owner of an Infiniti (INFINITI) JX35 with a Massachusetts registration and license plate number 1RLS32. During the course of the investigation, investigators learned the INFINITI was undergoing repairs and not returned to WIGGINS until April 3 or April 4, 2023, which, in the view of investigators, explains why WIGGINS had rented the SORENTO.

WIGGINS in Springfield, Massachusetts. Law enforcement officers observed BOST in the front passenger seat and a female in the driver's seat. A marked cruiser activated its emergency lights and conducted a motor vehicle stop of the INFINITI.

40. BOST was removed from the vehicle and placed in handcuffs. During a search incident to arrest, officers retrieved a black firearm located in the front sweatshirt pocket worn by BOST. The firearm was later identified as a Glock 43x, nine-millimeter handgun with serial number BPLS383. The firearm was loaded with a high-capacity magazine containing ten rounds of nine-millimeter ammunition with one round in the chamber. The handgun recovered from BOST's person resembles the handgun observed in the RJ Store robbery surveillance. On April 07, 2023, Massachusetts State Police conducted a forensic firearm examination of the Glock and determined it is a firearm within the meaning of and as defined in Massachusetts General Law Chapter 140 Section 121, which included the firearm being test fired.

41. Based on my training and experience the Glock firearm and ammunition recovered from BOST were not commercially manufactured in Massachusetts and thus necessarily crossed one or more state lines before being found in BOST's possession on April 06, 2023. As such the Glock firearm traveled in and affected interstate commerce.

42. A review of BOST's criminal history reveals that he has several felony convictions including, but not limited to, a 2017 conviction for Armed Robbery in violation of Massachusetts General Laws Chapter 265, §17, out of the Hampden Superior Court, on docket # 1779CR00027A, for which BOST received a sentence of six years to six years plus one day committed. BOST was also convicted in 2011 for Armed Robbery in violation of Massachusetts General Laws Chapter 265, §17, out of the Hampden Superior Court, on docket #1179CR00621, for which Bost received a sentence of four and a half years to five and a half years committed. Therefore, prior to possessing

the Glock firearm and ammunition, BOST knew he had previously been convicted of a crime punishable by more than one year in prison.

43. From my training and experience, I am aware that convictions outlined in the preceding paragraph are felonies under Massachusetts General Law and meet the definition of a “crime punishable by imprisonment for a term exceeding one year” as set forth in 18 U.S.C. § 921(a)(20). I am further aware that, prior to April 06, 2023, BOST has previously been convicted of other felony crimes that are punishable by imprisonment for a term exceeding one year as set forth in 18 U.S.C. Section 921(a)(20).

44. Subsequent investigation revealed that BOST has, at no time, requested or received any pardon from the Commonwealth of Massachusetts, for the above conviction, or any other convictions.

45. BOST was arrested for the outstanding warrants issued out of Hampden Superior Court, West Roxbury Division of the Boston Municipal Court, and the Framingham District Court. BOST was transported to MSP Barracks Westfield for processing. In addition, MSP charged BOST with, among other things, possession/carrying a firearm, possession of ammunition without an FID card, carrying a firearm with a large capacity magazine, possession of a large capacity weapon or feeding device, and possession of a firearm without an FID card.

46. The INFINITI was seized and transported to Boston Police Headquarters at 1 Schroeder Plaza in Boston, Massachusetts. The INFINITI remained stored at Boston Police Headquarters until April 28, 2023, when it was securely transported to the FBI garage located in Wilmington, Massachusetts. The Boston Police and FBI facilities are both locked and secured locations.

INTERVIEW OF BOST

47. On April 6, 2023, members from VCTF and BPD conducted a custodial interview of BOST at MSP Barracks B8, 75 Sergeant Thomas Dion Way, Westfield, Massachusetts. BOST was advised of his rights and signed a Miranda Waiver form. BOST was informed the interview would be audio recorded.

48. BOST advised the INFINITI is registered to WIGGINS, but they got the INFINITI out of the shop on April 3, 2023, or April 4, 2023, after returning the SORENTO on April 2, 2023.

49. BOST confessed to investigators he robbed the convenience store on Blue Hill Avenue. During the interview he told investigators he walked down the street and did the “boys’ shit and went right back like it was nothing”. BOST did not know the name of the store but knew exactly where the store was located. BOST stated he was “in and out” of the store. BOST minimized WIGGINS’ role, explaining that he told WIGGINS to park on Blue Hill Avenue because he wanted her to think he was visiting his baby mother’s house (who resides on Blue Hill Avenue).

50. Investigators showed BOST surveillance photos from the RJ Store and the 7-11 robberies, which included a picture of the sweatpants with the word “Ice Cream”. BOST said the clothing did not look like his, but everyone wears “Ice Cream” it is just regular clothing. He does not recall what he was wearing. BOST explained that everything he was wearing, and all his clothes, were in the INFINITI.

51. Investigators informed BOST they wanted to review his cell phone for the GPS location of the cell phone during the robberies. BOST stated looking at his phone for GPS is pointless, BOST turns his phone off and does not bring his phone with him when he does robberies.

INTERVIEW OF WIGGINS

52. On April 06, 2023, members from VCTF conducted a consensual interview with WIGGINS at Palmer Police Department located at 4419 Main Street in Palmer, Massachusetts. WIGGINS was advised she was not in custody. WIGGINS was read her advice of rights, signed the advice of rights, and consented to speaking with members from VCTF⁶. WIGGINS identified BOST as her on-again/off-again boyfriend. WIGGINS is currently homeless and living out of her car and hotels with BOST.

53. Over the past few months, WIGGINS drove her mother's white Infiniti, rental cars from Getaround, Inc., and the INFINITI. WIGGINS stated that her most recent rental from Getaround was a red Kia Sorento SUV, which she rented from an individual in Hyde Park. In addition, WIGGINS told investigators that BOST also drove the INFINITI and the vehicles she rented from Getaround, including the SORENTO.

54. During the interview, investigators provided WIGGINS with a photo from the surveillance footage taken from the robbery of RJ Store on March 29, 2023. WIGGINS advised investigators that BOST owns "Ice Cream" sweatpants similar to what can be seen in surveillance from the robbery on March 29th and that those sweatpants were currently in the INFINITI.

55. WIGGINS provided investigators with BOST's telephone number, which is 617-579-6920 ("the SUBJECT PHONE"). WIGGINS informed investigators that BOST has utilized this telephone number since October 2022.

56. Investigators issued a subpoena to T-Mobile for subscriber information for the SUBJECT PHONE. Subpoena returns identified the subscriber's name as Fernando BOST with an

⁶ WIGGINS did not provide consent for her interview to be recorded.

activation date of December 20, 2022.

57. WIGGINS also showed investigators a text message thread with BOST. Investigators observed a photo of BOST in a black top and black bottom with “Ice Cream” in white lettering on the leg. Investigators also observed a photo of a red Kia SUV on the text message thread. Still image from the text message thread included below:



SEARCH WARRANT ON GREEN INFINITI MA 1RLS32

58. On May 16, 2023, Investigators executed a search warrant case number 23-MJ-7232-JCB issued in the United States District for the District of Massachusetts. The search warrant was issued for the INFINITI.

59. Items seized from the search include the following:

A) Black “Ice Cream” Sweatshirt



B) Black “Ice Cream” Sweatpants



SEARCH WARRANT FOR INFORMATION ASSOCIATED THE SUBJECT PHONE

60. On August 21, 2023, Investigators served T-Mobile Inc. with a search warrant case number 23-mj-7343-JCB issued in the United States District for the District of Massachusetts. The

⁷ The Black “Ice Cream” Sweatpants match the sweatpants worn by the robber of the 7-11 located at 411 Pleasant Street in Brockton, Massachusetts on March 29, 2023, and the RJ Smokes and Convenience store robbery located at 844 Blue Hill Avenue in Boston, Massachusetts on March 29, 2023.

search warrant was issued for the information associated with the SUBJECT PHONE.

61. From approximately 1:01 AM EST until 9:02 PM EST on March 29, 2023, the SUBJECT PHONE consistently interacted with the cellular network. After 9:02 PM EST on March 29, 2023, the SUBJECT PHONE showed no interaction with the cellular network. In my training and experience, one possible reason the cell phone did not interact with the cellular network is the cell phone was turned off or in airplane mode.

62. Prior to 9:02 PM EST on March 29, 2023, the SUBJECT PHONE interactions with the cellular network appear to be consistent with the GPS locations provided by Getaround INC. for the Kia Sorento.

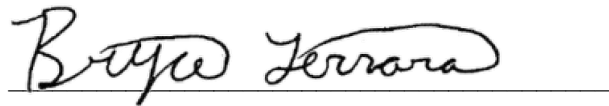
63. From approximately 1:01 AM EST until approximately 7:50 PM EST on March 29, 2023, the SUBJECT PHONE was active sending and receiving telephone calls and text messages.

64. After approximately 9:15 PM EST on March 29, 2023, phone calls to the SUBJECT PHONE appeared to go to voicemail. Based on statements BOST made to investigators during his interview, it seems likely he turned off his cell phone or put it into airplane mode approximately two hours prior to the first robbery.

65. Based on the information provided above, which includes a confession from BOST of his involvement in the armed robbery of the RJ Store; the presence of the SORENTO in the area of both the RJ Store and 7-11 at the time the robberies occurred; the similarities in clothing and appearance between the two robbers – male, dressed in all black; most notably blue gloves and “ice cream” pants; the execution of a search warrant on the INFINITI which located an article of clothing consistent with that worn by the robber in both robberies (the “ice cream” sweatpants);

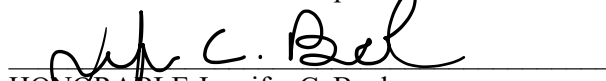
evidence that BOST was wearing similar “ice cream” sweatpants earlier in the day at Target; the arrest of BOST pursuant to state warrants; and the recovery of a handgun consistent in appearance with the firearm used in the RJ Store robbery, I submit that there is probable cause to believe that BOST did obstruct, delay, and affect, in any way and degree, commerce and the movement of any article and commodity in commerce, by robbery, as the term is defined in Title 18, U.S.C. § 1951. BOST did this by taking and obtaining property, consisting of money from the owners of the property against their will by means of actual and threatened force, violence, and fear of injury. at both the RJ Store and 7-11 store armed robberies on March 29, 2023. I submit that there is also probable cause to believe BOST, an individual who had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition, in or affecting interstate commerce, in violation of 18 U.S.C. § 922(g)(1) on April 06, 2023.

Respectfully submitted,



BRYCE FERRARA
Special Agent, FBI

Sworn to before me via telephone in accordance with Fed. Rule Crim. P. 4.1 on September 12, 2023.



HONORABLE Jennifer C. Boal
UNITED STATES MAGISTRATE JUDGE

